



State of Ohio Environmental Protection Agency

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Joe Bulzan  
Smurfit-Stone Container Corporation  
500 North Fourth Street  
Coshocton, Ohio 43812

Re: **Millcreek Landfill, Coshocton County**  
**Ohio Administrative Code (OAC) Rule 3745-27-10(E)(7)(b)**

Dear Mr. Bulzan:

The Southeast District Office (SEDO) of the Ohio Environmental Protection Agency (Ohio EPA) has received reports by Smurfit-Stone Container Corporation (Smurfit-Stone) indicating statistically significant changes in ground water quality at the Millcreek Landfill. The following monitoring wells have been reported having statistically significant changes; W-8LK for barium on July 25, 2000, W-7LKC for sodium on December 19, 2000, W-3LK for sodium on June 14, 2001, W-6LK for chromium and TKN on September 10, 2001, and W-5LKC for alkalinity on September 12, 2002.

### **Return to Detection Monitoring**

On January 15, 2002, a ground water demonstration, titled "*Demonstration that Previous Statistical Changes Resulted from Natural Variation and/or Error in Sampling for Wells W-8LK, W-7LKC, W-3LK, W-6LK*" was submitted to SEDO indicating that these increases were not a result of the landfill. Ohio EPA's Division of Drinking and Ground Waters (DDAGW) has reviewed the information within this demonstration. Based on the information provided, Ohio EPA concurs with the demonstration that the above noted variation in the ground water quality is not the result of the landfill.

Pursuant to OAC Rule 3745-27-10(E)(7)(b), the owner or operator of the Millcreek Landfill is hereby authorized to reinstate the detection monitoring program, as described in OAC Rules 3745-27-10(C) and (D), with respect to the aforementioned parameters and monitoring wells.

Should future or existing ground water sampling results indicate statistically significant increases in ground water monitoring parameters, the owner or operator will be required to enter into assessment monitoring in accordance with OAC Rule 3745-27-10(E) or obtain an approval to remain in the detection monitoring program in accordance with OAC Rule 3745-27-10(D)(7)(c).

You are hereby notified that the action of the Director of Environmental Protection, explained in the previous paragraphs for monitoring wells W-8LK, W-7LKC, W-3LK, W-6LK, is final and may

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Jennette Bradley, Lieutenant Governor  
Christopher Jones, Director

be appealed to the Environmental Review Appeals Commission (Commission) pursuant to Ohio Revised Code Section 3745.04. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed with the Commission within thirty (30) days after notice of the director's action. A copy of the appeal must be served on the director within three (3) days of filing with the Commission. An appeal may be filed with the Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

### **Decline to Return to Detection Monitoring**

Pursuant to OAC Rule 3745-27-10(E)(7)(b), the facility submitted a demonstration letter for monitoring well W-5LKC, on September 12, 2002, with the semi-annual monitoring data. The letter indicated a statistically significant change for alkalinity, and a demonstration that the change was due to natural variation in ground water quality and/or error in sampling, analysis, or statistical evaluation.

Following a review of the data submitted for monitoring well W-5LKC by DDAGW, it appears the water quality is dramatically changing. The alkalinity levels have increased from 110 mg/L in July 1997 to 240 mg/L in the most recent report. Sodium levels have increased from 42 mg/L to 188 mg/L. Sulfate levels have dropped from 2600 mg/L to 675 mg/L. The March 2002 leachate samples reported an alkalinity level of 1583 mg/L. Smurfit-Stone has not adequately demonstrated that the statistically significant increase found in monitoring well W-5LKC was not the result of impact from the landfill. Therefore, I decline to grant approval to return to ground water detection monitoring at monitoring well W-5LKC.

If you have any questions concerning this document, please contact Dale Warner at the Ohio EPA, SEDO at (740) 380-5435.

Sincerely,

Christopher Jones  
Director

cc: Scott Hester, DSIWM-CO  
Steve Rine, DSIWM-SEDO  
Coshocton County Health Department